

OUTGOING LTR. NO.

DOE ORDER # 4700.1

95 RF 0304 1

DISTRIBUTION

LTR/ENC

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

March 31, 1995

95-RF-03041

Scott R. Grace
Environmental Restoration Division
DOE/RFFO

**PROCESS FOR DISCONTINUATION OF OPERABLE UNIT 1 (OU 1) AND
OPERABLE UNIT 2 (OU 2) TREATMENT FACILITIES AND UTILIZING THE
PROPOSED SITEWIDE TREATMENT FACILITY - ALP-019-95**

Action: Request process for discontinuation be communicated to the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE).

After considering available treatment options for OU 1 and OU 2 water sources, EG&G Rocky Flats, Inc. recommends the following to realize significant cost savings, increase efficiency for treatment of environmental water sources at Rocky Flats Environmental Technology Site, and minimize waste generated. EG&G Rocky Flats, Inc. therefore recommends discontinuing the OU 2 and OU 2 treatment facilities and utilizing the proposed Sitewide Treatment Facility (STF). Following are the steps that must be taken in order to facilitate this approach. EG&G Rocky Flats, Inc. recommends that these be communicated to the EPA and CDPHE as soon as possible to obtain buy-in for this approach.

Obtain Final Approval to Discontinue Treatment for SW-61 and SW-132

Preliminary approval to discontinue collection and treatment of SW-61 and SW-132 was granted in May, 1994 with the provision that the capability to resume collection at these sources be maintained until the EPA and CDPHE receive analytical results from confirmatory sampling. As per the letter 95-RF-02339 on March 15, 1995, EG&G Rocky Flats, Inc. requests that the EPA and CDPHE be requested to provide final approval to discontinue treatment of these two sources. At that time, the collection system for these two sources will be dismantled.

Begin Treatment of SW-59 at the OU 2 water (SW-59) at the OU 1 Treatment Facility until the Sitewide Treatment Facility is in-place. SW-59 water will be collected at the source in a storage tank to be handled as a 90 day storage unit.

After collection, the water will be trucked to the OU 1 Treatment Facility for treatment. The more stringent of the OU 1 and OU 2 Applicable or Relevant and Appropriate Requirements (ARAR) will be met at the OU 1 Facility before treated water is released until the sitewide ARAR are determined and implemented.

Discontinue the OU 2 Interim Measure/Interim Remedial Action (IM/IRA)

The original OU 2 IM/IRA required treating water from the SW-59, SW-61 and SW-132 locations at the OU 2 FTU. Treatment of SW-59 water at the OU 1 Treatment Facility, and in the future at the Sitewide Treatment Facility, is more cost effective than maintaining a separate treatment facility. Therefore, the OU 2 Field Treatment Unit is no longer required. As the main purposes of this IM/IRA have been satisfied, the IM/IRA is

AMARAL, M.E.	
BURLINGAME, A.H.	
BRANCH, D.B.	
CARNIVAL, G.J.	
DAVIS, J.G.	
FERERRA, D.W.	
FRAY, R.E.	
GEIS, J.A.	
GLOVER, W.S.	
GOLAN, P.M.	
HANNI, B.J.	
HARMAN, L.K.	
HEALY, T.J.	
HEDAH, T.	
HILBIG, J.G.	
HUTCHINS, N.M.	
JACKSON, D.T.	
KELL, R.E.	
KUESTER, A.W.	
MARX, G.E.	
MCDONALD, M.M.	
McKENNA, F.G.	
MONTROSE, J.K.	
MORGAN, R.V.	
POTTER, G.L.	
PIZZUTO, V.M.	
RISING, T.L.	
SANDLING, N.B.	
SCHWARTZ, J.K.	
SETLOCK, G.H.	
STEWART, D.L.	
STIGER, S.G.	
TOBIN, P.M.	
VOORHEIS, G.M.	
WILSON, J.M.	

PJ LAURIN	X
JEFF BRAY	X
AL FRIMMER	X
Mike Ruppert	X
Becky Hirsch	X
Marla Broward	X
Mark Barmeter	X
Russ Cirillo	X
TYUESS	X
CORRES. CONTROL	X
ADMIN RECORD	X
PROJECT FILE	X
PATS	

CLASSIFICATION	
UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS:

PARTIAL/OPEN ☐

CLOSED ☐

LETTER APPROVALS:

ORIGINATOR & TYPIST INITIALS
AUP b11

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

no longer necessary and should be closed. In the event that this is not acceptable to the regulatory agencies, EG&G Rocky Flats, Inc. recommends that the OU 2 IM/IRA be restricted to collection of SW-59 water only.

Some components of the current OU 2 FTU are proposed to be utilized during construction of the Sitewide Treatment Plant. The remaining equipment and facilities will be surplussed.

The pipeline connecting SW-59, SW-61 and SW-132 with the OU 2 FTU will be removed, monitored for contaminating and released for recycling, waste or reuse.

As the risk for SW-59 water is negligible at the ponds, the eventual goal is to gain approval from the regulatory agencies to discontinue all treatment of this source. This will require more in-depth evaluation of data from this source prior to proposing discontinuation of treatment.

Authorize the Sitewide Treatment Facility Using the Proposed Action Memorandum (PAM) Process

EG&G Rocky Flat, Inc. recommends that the PAM process be utilized for the purpose of obtaining authorization for operating a Sitewide Treatment Facility and gathering the necessary regulatory agency and public comments and approvals.

The STF will be constructed at the present OU 1 Facility location using most of the current OU 1 Treatment Facility equipment selected components from the OU 2 Facility. The OU 2 components will be used with other equipment to construct a rad pre-filtering unit. The STF will process water in batches and will have the ability to selectively route water sources through different processes based on the contamination present. This will result in the flexibility to treat varied sources in a cost efficient and waste minimizing manner.

The STF will be authorized to treat all water sources currently treated at the OU 1 and OU 2 facilities, and other water sources which will be identified in the PAM. ARAR used at this facility will be the more stringent of the OU 1 and OU 2 Facilities ARAR until the sitewide Arar are approved and implemented at Rocky Flats Environmental Technology Site. At that time, the Sitewide Arar will be met at this facility.


Reduce the OU 1 IM/IRA to Collection Only

There will no longer be a need for the OU 1 Treatment Facility after approval of the Sitewide Treatment Facility and approval after approval of the Sitewide Treatment Facility and approval for treatment of OU 1 water sources at this facility. In fact, the OU 1 Treatment Facility will not exist as a stand-alone facility after construction of the STF. Therefore, EG&G Rocky Flats, Inc. recommends that the OU 1 IM/IRA be limited to collection of water from the French Drain and the Collection Well. Water from these sources will be treated as per the Sitewide PAM.

As this recommendation represents a substantial improvement, EG&G Rocky Flats, Inc recommends that this information be presented to EPA and CDPHE at an informal meeting prior to official notification.

S. R. Grace
March 31, 1995
ALP-019-95
Page 3

If you have any questions or concerns, please contact Mike Rupert at extension 6950, Pete Laurin at extension 8702, Marla Broussard at extension 8517 or Ty Vess at extension 6540.



Annette L. Primrose, Manager
Group 1 Closure
EG&G Rocky Flats, Inc.

ALP:bll

Orig. and 1 cc - S. R. Grace

cc:

E.A. Dillé	-	SAIC
D. George	-	DOE
B. Williamson	-	DOE
V. Witherill	-	DOE
J. Weinand	-	DOE